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Hon. Frederic Block
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn NY 11201-1818

November 11, 2008

RE: Roy Den Hollander v. Deborah Swindells Donovan, et. al.
08-CV-4045 (FB) (CLP)

Dear Judge Block:

I am a named Defendant in the above-titled matter. I write to request a pre-motion conference to permit me to file a motion to dismiss.


Defendant Deborah S. Donovan is represented by Ms. Krebs of Gordon & Rees, which has submitted a letter to this court; Ms. Krebs' letter of November 6 sets forth in detail three sound bases for a motion to dismiss, and in the interest of brevity I will respectfully refer the court to Ms. Krebs' analysis.

I would only add that the point raised by Ms. Krebs regarding statements made by counsel in legal proceedings is a valid concern, particularly in instances where there is a vexatious plaintiff with a documented history of pursuing litigation against attorneys who defeat him.

Just as Ms. Donovan submitted portions of Mr. Den Hollander's blog in connection with litigation in federal litigation initiated by Mr. Den Hollander, I submitted portions of the same blog in connection with state court litigation initiated by Mr. Den Hollander (NY Cty Civ. Ct. # 021283/06). That litigation originated as a defamation action against me for statements made in pleadings submitted on behalf of my client (NY Supreme # 116711/2003). Specifically, in response to the defamation action, I addressed matters relating to Mr. Den Hollander's motivation in bringing suit and also concern for the physical protection of parties whom Mr. Den Hollander was seeking to join in the action. I would also note that I assumed representation in the NY Supreme matter after Mr. Den Hollander brought a motion to discipline my client's previous counsel (the motion was denied by Justice Madden).

Thank you for your consideration.

Respectfully submitted,


Paul Steinberg
Defendant *pro se*

